

25

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

v.

RYAN DANIEL RICHMOND,

Defendant

Case:2:21-cr-20209  
Judge: Parker, Linda V.  
MJ: Patti, Anthony P.  
Filed: 03-24-2021 At 04:37 PM  
INDI USA V RYAN DANIEL RICHMOND (LG  
)

: Ct. 1: 26 U.S.C. § 7212(a) -  
: Obstruction of the IRS  
:  
: Ct. 2: 18 U.S.C. § 1001-  
: False Statements  
:  
: Ct. 3-6: 26 U.S.C. § 7203 -  
: Tax Evasion – Evasion of Assessment  
:  
: Ct. 7: 26 U.S.C. § 7203 -  
: Willful Failure to File a Tax Return

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**INDICTMENT**

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**THE GRAND JURY CHARGES THAT:**

At times relevant to this Indictment:

**Introduction**

***The Defendant and Relevant Entities***

1. Defendant RYAN DANIEL RICHMOND was a resident of  
Bloomfield Hills, Michigan.

2. Relief Choices, L.L.C. ("Relief Choices") was a limited liability company operating in Warren, Michigan. Relief Choices provided storefront medical marijuana dispensary services to customers. Defendant RYAN DANIEL RICHMOND was the sole owner and operator of Relief Choices, possessed signatory authority over its bank accounts, and controlled its expenditure of funds to pay expenses.

3. Realty Plus International, L.L.C. ("Realty Plus") was a limited liability company registered in Royal Oak, Michigan. Realty Plus was an entity that purported to provide consulting services, but was used as a nominee entity by Defendant RYAN DANIEL RICHMOND. Defendant established and used bank accounts in Realty Plus's name to deposit, hold, and spend business gross receipts earned by Relief Choices. Defendant was the sole owner of Realty Plus and possessed sole signatory authority over its bank accounts.

4. Richmond Media, L.L.C. ("Richmond Media") was a limited liability company registered in Royal Oak, Michigan. Richmond Media was an entity that purported to provide media and website management services, but was used as a nominee entity by Defendant RYAN DANIEL RICHMOND. Defendant established and used bank accounts in the name of Richmond Media to deposit, hold, and spend business gross receipts

earned by Relief Choices. Defendant was the sole owner of Richmond Media and possessed sole signatory authority over its bank accounts.

5. INDIVIDUAL A, an individual known to the grand jury, worked as a storefront manager for Relief Choices, and his duties included providing bookkeeping and employee management services.

6. Schell Group, L.L.C. ("Schell Group") was a limited liability company registered in Warren, Michigan. Schell Group was an entity that purported to provide consulting services, but from on or about 2012 through 2014 Schell Group was used as a nominee entity by Defendant RYAN DANIEL RICHMOND and INDIVIDUAL A to establish merchant payment settlement accounts that were used to process debit card or credit card transactions for Relief Choices' customers.

7. The Internal Revenue Service ("IRS") was an agency of the United States Department of the Treasury, responsible for administering and enforcing the tax laws of the United States.

**Defendant's Individual Income Taxes**

8. Pursuant to Title 26 of the United States Code, every citizen and resident of the United States who received gross income in excess of the minimum filing amount established by law for a particular calendar year was required to make and file annually an individual income tax return with

the IRS, such as an U.S. Individual Income Tax Return, Form 1040 ("Form 1040").

9. A Form 1040, U.S. Individual Income Tax Return, was a tax return filed with the IRS in the name of a taxpayer that reported, among other things, the taxpayer's income, deductions and credits, and the amount of tax owed or tax refund claimed.

10. A Schedule C, Profit or Loss From Business ("Schedule C"), was an IRS form that taxpayers attached to Forms 1040, when applicable, to report, among other things, income and expenses from business entities treated as sole proprietorships pursuant to federal internal revenue laws.

11. A Form 1099-K, Payment Card and Third Party Network Transactions, ("Form 1099-K"), was an IRS information return used to report certain payments, including customer debit card or credit card payments to a business. A Form 1099-K reported financial information, such as the gross amount of all reportable debit card or credit card payment transactions received by an entity or taxpayer. Typically, an entity would receive a Form 1099-K from each payment settlement entity that provided payments processing services to the entity for the particular year.

12. Defendant RYAN DANIEL RICHMOND did not elect to treat Relief Choices, Richmond Media, and Realty Plus, which registered as

single-member limited liability companies, as corporations for tax reporting purposes, and thus were treated by the IRS as disregarded entities for tax purposes.

13. An individual owner of a single-member limited liability company that operated as a trade or business was subject to the tax on net earnings from self-employment in the same manner as a sole proprietorship.

14. Defendant RYAN DANIEL RICHMOND, as the sole owner and member of Relief Choices, Richmond Media, and Realty Plus, was required to file an individual income tax return with the IRS, such as a Form 1040 with Schedules C attached, reporting the gross income, deductions, and distributions earned by Relief Choices, Richmond Media, and Realty Plus.

***Defendant Caused Relief Choices to Maintain Two Sets of Books***

15. From at least October 5, 2011, through at least in or about December 31, 2014, Defendant RYAN DANIEL RICHMOND executed a scheme to generate and maintain two sets of Relief Choices' business records ("Two Sets of Books Scheme"), wherein he generated, or caused to be generated, two sets of business records purporting to show Relief Choices' business gross sales, consisting of: (1) a fraudulent set of business records that understated Relief Choices' business gross sales, by

among other things, omitting the majority of cash sales receipts; and (2) an accurate set of business records generated using a point-of-sale system that included all business gross sales, including cash sales that were not deposited into a Relief Choices' bank account.

**IRS Tax Examination Activity**

16. On or about October 16, 2014, the IRS sent a Letter to Defendant RYAN DANIEL RICHMOND and his spouse, notifying them the IRS had initiated a tax examination by mail of the individual income taxes he owed for calendar year 2012, and informing him he owed approximately \$66,758.43 in additional individual income taxes.

17. On or about December 5, 2014, Defendant RYAN DANIEL RICHMOND and his spouse responded to the IRS' October 16, 2014 letter, through their accountant, with a letter indicating, among other things that Defendant intended to file an Amended U.S. Individual Income Tax Return, Form 1040X ("Form 1040X") for calendar year 2012, reporting an additional \$3,518 in Adjusted Gross Income and an additional \$1,726 of individual income tax due and owing.

18. On October 6, 2015, Defendant RYAN DANIEL RICHMOND participated in an IRS examination interview and provided false and misleading information to an IRS Revenue Agent regarding, among other

things, his knowledge of, and income from, the operation of Relief Choices during calendar years 2011, 2012, 2013, and 2014.

19. On or about March 11, 2016, an IRS Revenue Agent informed Defendant RYAN DANIEL RICHMOND prior to a scheduled interview that the IRS had expanded its ongoing tax examination, and was currently conducting a tax examination of the individual income taxes Defendant RYAN DANIEL RICHMOND owed for calendar years 2010, 2011, 2012, 2013, and 2014.

20. On March 11, 2016, Defendant RYAN DANIEL RICHMOND participated in an IRS examination interview and provided false and misleading information to an IRS Revenue Agent regarding, among other things, his knowledge of, and income from, the operation of Relief Choices during calendar years 2010, 2011, 2012, and 2014.

21. On August 10, 2016, Defendant RYAN DANIEL RICHMOND participated in an IRS examination interview and provided false and misleading information to an IRS Revenue Agent regarding, among other things, his knowledge of, and income from, the operation of Relief Choices during calendar years 2010, 2011, 2012, 2013, and 2014.

**COUNT ONE**

**26 U.S.C. § 7212(a)**

**Corrupt Endeavor to Obstruct or Impede the  
Due Administration of the Internal Revenue Laws**

22. The allegations in Paragraphs 1 through 21 of this Indictment are re-alleged as if set forth in full herein.

23. From on or about October 16, 2014, to on or about August 10, 2016, in the Eastern District of Michigan and elsewhere,

RYAN DANIEL RICHMOND,

the Defendant herein, with knowledge of a pending or reasonably foreseeable IRS proceeding, an IRS examination, did corruptly obstruct and impede, and corruptly endeavor to obstruct and impede, the due administration of the Internal Revenue Laws, that is, the IRS examination described in paragraphs 16 through 21, by engaging in the following acts, among others, each such act having a nexus to the IRS examination:

a. From on or about October 16, 2014, through January 5, 2015, Defendant RYAN DANIEL RICHMOND provided false business records to his accountant and prepared and caused to be prepared, and signed and caused to be signed, a false and fraudulent 2012 Form 1040X and attached Schedule C, which were submitted to the IRS.



b. On or about October 6, 2015, Defendant RYAN DANIEL RICHMOND participated in an IRS examination interview and provided false and misleading information to an IRS Revenue Agent regarding his active control and financial profit from Relief Choices' business operations during calendar years 2011, 2012, 2013, and 2014, falsely stating, among other things that:

- (i) he and his businesses did not deal with cash at all; and
- (ii) he was not actively involved in Relief Choices' business operations.

c. On or about March 11, 2016, Defendant RYAN DANIEL RICHMOND participated in an IRS examination interview and provided false and misleading information to an IRS Revenue Agent regarding his active control and financial profit from Relief Choices' business operations during calendar years 2011, 2012, 2013, and 2014, falsely stating, among other things that:

- (i) his main role at Relief Choices was to provide advice; and
- (ii) he was not involved in the operations or management of Relief Choices in any capacity and he did not deal with vendors or suppliers.

d. On or about August 10, 2016, Defendant RYAN DANIEL RICHMOND participated in an IRS examination interview and provided

false and misleading information to an IRS Revenue Agent regarding his active control and financial profit from Relief Choices' business operations during calendar years 2011, 2012, 2013, and 2014, falsely stating, among other things that:

- (i) he did not own Relief Choices;
- (ii) he only invested in the entity Relief Choices; and
- (iii) Relief Choices was a business entity name used by Schell

Group to buy and sell for Relief Choices because Relief Choices was just a marketing name.

**All in violation of Title 26, United States Code, Section 7212(a).**

**COUNT TWO**

**18 U.S.C. § 1001  
False Statements**

24. The allegations in Paragraphs 1 through 21 of this Indictment are re-alleged as if set forth in full herein.

25. On or about August 10, 2016, in the Eastern District of Michigan,

**RYAN DANIEL RICHMOND,**

the Defendant herein, unlawfully, willfully, and knowingly, in a matter within the jurisdiction of the executive branch of the Government of the United

States, falsified, concealed, and covered up by trick, scheme, and device material facts, and made materially false, fictitious, and fraudulent statements and representations, to wit, Defendant participated in an interview with the IRS in Pontiac, Michigan, in which he made the following false statements and concealed and covered up facts that were material to the IRS examination:

Specification One

Defendant RYAN DANIEL RICHMOND falsely stated that he did not own Relief Choices and he only invested in the entity because Relief Choices was a marketing entity name used by Schell Group to buy and sell for the storefront location.

Specification Two

Defendant RYAN DANIEL RICHMOND falsely stated that regarding his duties for Relief Choices, he did nothing operational.

Specification Three

Defendant RYAN DANIEL RICHMOND falsely stated that regarding his duties for Relief Choices, he never bought or sold the products sold at Relief Choices storefront location from vendors or suppliers.

**All in violation of Title 18, United States Code, Section 1001(a)(1) and (2).**

**COUNT THREE**

**26 U.S.C. § 7201**

**Tax Evasion – Evasion of Assessment**

26. The allegations in Paragraphs 1 through 21 of this Indictment are re-alleged as if set forth in full herein.

27. From on or about January 1, 2011, through on or about August 10, 2016, in the Eastern District of Michigan and elsewhere,

RYAN DANIEL RICHMOND,

the Defendant herein, a resident of Bloomfield Hills, Michigan, willfully attempted to evade and defeat a substantial part of the income tax due and owing by him and his spouse to the United States of America for the calendar year 2011, by committing the following affirmative acts of evasion, among others:

a. Defendant RYAN DANIEL RICHMOND prepared and caused to be prepared, and signed and caused to be signed, a false and fraudulent Form 1040 with attached Schedule C for calendar year 2011, which were submitted to the IRS on or about April 9, 2012.

b. During calendar year 2011, Defendant RYAN DANIEL RICHMOND caused Relief Choices' vendors and other business expenses to be paid primarily with cash.

c. During calendar year 2011, Defendant RYAN DANIEL RICHMOND executed, and caused the execution of, the Two Sets of Books Scheme, referenced above.

d. During calendar year 2011, Defendant RYAN DANIEL RICHMOND used Richmond Media, and other businesses, as nominee entities by depositing, or directing others to deposit, credit card gross receipts earned by Relief Choices into business bank accounts in the name of Richmond Media, rather than depositing cash gross receipts into a Relief Choices bank account.

e. On or about October 16, 2015, Defendant RYAN DANIEL RICHMOND made false or misleading statements to an IRS Revenue Agent during an IRS examination interview in an attempt to evade and defeat his tax due and owing for calendar year 2011 by falsely stating, among other things, that:

(i) he did not recall receiving a 2011 Form 1099-K issued to Relief Choices;

(ii) he did not know why INDIVIDUAL A set up Relief Choices' employee payroll and submitted Relief Choices' employee payroll reporting documents to the IRS listing Defendant RYAN DANIEL RICHMOND's personal residence address as a contact address; and

(iii) he understood that some deposits into the Relief Choices' bank account were part of Schell Group's gross receipts because he thought the source of the funds was a vendor of Schell Group.

**All in violation of Title 26, United States Code, Section 7201.**

**COUNT FOUR**

**26 U.S.C. § 7201**

**Tax Evasion – Evasion of Assessment**

28. The allegations in Paragraphs 1 through 21 of this Indictment are re-alleged as if set forth in full herein.

29. From on or about January 1, 2012, through on or about August 10, 2016, in the Eastern District of Michigan and elsewhere,

**RYAN DANIEL RICHMOND,**

the Defendant herein, a resident of Bloomfield Hills, Michigan, willfully attempted to evade and defeat a substantial part of the income tax due and owing by him and his spouse to the United States of America for the calendar year 2012, by committing the following affirmative acts of evasion, among others:

a. Defendant RYAN DANIEL RICHMOND prepared, and caused to be prepared, and signed, and caused to be signed, a false and fraudulent Form 1040 and attached Schedule C-EZ, for calendar year

2012, which were submitted to the IRS on or about March 7, 2013.

b Defendant RYAN DANIEL RICHMOND prepared and caused to be prepared, and signed, and caused to be signed, a false and fraudulent Form 1040X and attached Schedule C, which were submitted to the IRS on or about January 5, 2015, and omitted income and thereby falsely understated his taxable income and tax due and owing for calendar year 2012 and as a result there was substantial additional tax due and owing to the United States of America.

c. During calendar year 2012, Defendant RYAN DANIEL RICHMOND caused Relief Choices' vendors and other business expenses to be paid primarily with cash.

d. During calendar year 2012, Defendant RYAN DANIEL RICHMOND executed, and caused the execution of, the Two Sets of Books Scheme, referenced above.

e. During calendar year 2012, Defendant RYAN DANIEL RICHMOND used, and caused the use of, Richmond Media, Realty Plus, and Schell Group as nominee entities by establishing merchant payment settlement accounts in the names of Richmond Media, Realty Plus, and Schell Group and directing others to process debit card and credit card transactions for Relief Choices' customers using the Richmond Media,

Realty Plus, and Schell Group business names.

f. During calendar year 2012, Defendant RYAN DANIEL RICHMOND used, and caused the use of, Richmond Media, Realty Plus, and Schell Group as nominee entities by depositing, or directing others to deposit, credit card and cash gross receipts earned by Relief Choices into business bank accounts in the names of Richmond Media, Realty Plus, and Schell Group, rather than depositing cash gross receipts into a Relief Choices bank account.

g. During calendar year 2012, Defendant RYAN DANIEL RICHMOND directed, or caused others to direct, Relief Choices' employees to personally hand-deliver cash gross receipts to him on a daily basis, rather than regularly depositing cash gross receipts into a Relief Choices' bank account.

h. On or about October 16, 2015, made false or misleading statements to an IRS Revenue Agent during an IRS examination interview in an attempt to evade and defeat his tax due and owing for calendar year 2012 by falsely stating, among other things that regarding the services or business Schell Group performed to earn money, Defendant RYAN DANIEL RICHMOND understood Schell Group was in the health business and he was not sure what that meant, but suggested that the IRS Revenue



Agent could get clarification from INDIVIDUAL A , whom Defendant described as the owner of Schell Group.

i. On or about March 11, 2016, Defendant RYAN DANIEL RICHMOND made false or misleading statements to an IRS Revenue Agent during an IRS examination interview in an attempt to evade and defeat his tax due and owing for calendar year 2012 by falsely stating, among other things that:

(i) Defendant RYAN DANIEL RICHMOND reported all of the income he earned on his Schedule C attached to his 2012 Form 1040X;

(ii) the accountant who prepared Defendant RYAN DANIEL RICHMOND's 2012 Form 1040X made guesses at items the accountant put on the return; and

(iii) Defendant RYAN DANIEL RICHMOND had an agreement with INDIVIDUAL A that Defendant was only acting as a person accepting credit card payments for Relief Choices.

**All in violation of Title 26, United States Code, Section 7201.**

**COUNT FIVE**

**26 U.S.C. § 7201**

**Tax Evasion – Evasion of Assessment**

30. The allegations in Paragraphs 1 through 21 of this Indictment are re-alleged as if set forth in full herein.

31. From in or about January 1, 2013, through in or about August 16, 2016, in the Eastern District of Michigan and elsewhere,

**RYAN DANIEL RICHMOND**

the Defendant herein, a resident of Bloomfield Hills, Michigan, willfully attempted to evade and defeat a substantial part of the income tax due and owing by him and his spouse to the United States of America for the calendar year 2013, by committing the following affirmative acts of evasion, among others:

a. Defendant RYAN DANIEL RICHMOND prepared, and caused to be prepared, and signed, and caused to be signed, a false and fraudulent Form 1040 and attached Schedule C, for calendar year 2013, which were submitted to the IRS on or about April 12, 2014.

b. During calendar year 2013, Defendant RYAN DANIEL RICHMOND caused Relief Choices' vendors and other business expenses to be paid primarily with cash.

c. During calendar year 2013, Defendant RYAN DANIEL RICHMOND executed, and cause the execution of, the Two Sets of Books Scheme, referenced above.

d. During calendar year 2013, Defendant RYAN DANIEL RICHMOND used, and caused the use of, Richmond Media, Realty Plus, and Schell Group as nominee entities by establishing merchant payment settlement accounts in the names of Richmond Media, Realty Plus, and Schell Group and directing others to process debit card and credit card transactions for Relief Choices' customers using the Richmond Media, Realty Plus, and Schell Group business names.

e. During calendar year 2013, Defendant RYAN DANIEL RICHMOND used, and caused the use of, Richmond Media, Realty Plus, and Schell Group as nominee entities by depositing, or directing others to deposit, credit card and cash gross receipts earned by Relief Choices into business bank accounts held in the names of Richmond Media, Realty Plus, and Schell Group, rather than depositing cash gross receipts into a Relief Choices bank account.

f. During calendar year 2013, Defendant RYAN DANIEL RICHMOND directed, or caused others to direct, Relief Choices' employees to personally hand-deliver cash gross receipts to him on a daily

basis, rather than regularly depositing cash gross receipts into a Relief Choices' bank account.

g. On or about October 16, 2015, Defendant RYAN DANIEL RICHMOND made false or misleading statements to an IRS Revenue Agent during an IRS examination interview in an attempt to evade and defeat his tax due and owing for calendar year 2013 by falsely stating, among other things that during calendar year 2013, any Relief Choices' or Richmond Media's gross sales reported on Forms 1099-K were Schell Group income and expenses.

**All in violation of Title 26, United States Code, Section 7201.**

**COUNT SIX**

**26 U.S.C. § 7201**

**Tax Evasion - Evasion of Assessment**

32. The allegations in Paragraphs 1 through 21 of the Indictment are re-alleged as if set forth in full herein.

33. During the calendar year 2014, Defendant RYAN DANIEL RICHMOND received taxable income, upon which there was income tax due and owing to the United States of America. Knowing the foregoing facts and failing to make an income tax return to the IRS, and to pay the income tax to the IRS, on or before April 15, 2015, as required by law, from

on or about January 1, 2014, to on or about March 3, 2016, in the Eastern District of Michigan and elsewhere,

RYAN DANIEL RICHMOND,

the Defendant herein, did willfully attempt to evade and defeat the substantial income tax due and owing by him to the United States of America for the 2014 calendar year by committing the following affirmative acts of evasion, among others:

a. During calendar year 2014, Defendant RYAN DANIEL RICHMOND caused Relief Choices' vendors and other business expenses to be paid primarily with cash.

b. During calendar year 2014, Defendant RYAN DANIEL RICHMOND executed, and cause the execution of, the Two Sets of Books Scheme, referenced above.

c. During calendar year 2014, Defendant RYAN DANIEL RICHMOND used, and caused the use of, Richmond Media, Realty Plus, and Schell Group as nominee entities by using merchant payment settlement accounts in the names of Richmond Media, Realty Plus, and Schell Group and directing others to process debit card and credit card transactions for Relief Choices' customers using the Richmond Media, Realty Plus, and Schell Group business names.

d. During calendar year 2014, Defendant RYAN DANIEL RICHMOND used, and caused the use of, Richmond Media, Realty Plus, and Schell Group as nominee entities by depositing, or directing others to deposit, credit card and cash gross receipts earned by Relief Choices into business bank accounts held in the names of Richmond Media, Realty Plus, and Schell Group, rather than depositing cash gross receipts into a Relief Choices' bank account.

e. During calendar year 2014, Defendant RYAN DANIEL RICHMOND directed, or caused others to direct, Relief Choices' employees to personally hand-deliver cash gross receipts to him on a daily basis, rather than regularly depositing cash gross receipts into a Relief Choices' bank account.

f. On or about October 16, 2015, Defendant RICHMOND DANIEL RICHMOND made false and misleading statements to an IRS Revenue Agent during an IRS examination interview in an attempt to evade and defeat his tax due and owing for calendar year 2014 by falsely stating, among other things that from January to June of 2014, Defendant RYAN DANIEL RICHMOND was not actively involved in Relief Choices' operations and earned no income from Relief Choices.

**All in violation of Title 26, United States Code, Section 7201.**

**COUNT SEVEN**

**26 U.S.C. § 7203  
Willful Failure to File a Tax Return**

34. The allegations in Paragraphs 1 through 21 of the Indictment are re-alleged as if set forth in full herein.

35. During the 2014 calendar year set forth below, in the Eastern District of Michigan and elsewhere,

**RYAN DANIEL RICHMOND**

the Defendant herein, who was a resident of Bloomfield Hills, Michigan, had and received gross income through Realty Plus, Relief Choices, and Richmond Media in excess of \$20,300. By reason of such gross income, he was required by law, following the close of the 2014 calendar year, on or before the filing deadline, to make an individual income tax return to the IRS, stating specifically the items of his gross income and any deductions and credits to which he was entitled. Well knowing and believing all of the foregoing, Defendant did willfully fail, by on or about the filing deadline of April 15, 2015, in the Eastern District of Michigan and elsewhere, to make an individual income tax return for the calendar year 2014.

**All in violation of Title 26, United States Code, Section 7203.**

A TRUE BILL

Dated: March 24, 2021

/s/ GRAND JURY FOREPERSON

/s/ Stuart M. Goldberg  
STUART M. GOLDBERG  
Acting Deputy Assistant Attorney  
General  
U.S. Department of Justice, Tax  
Division

/s/ Mark McDonald  
MARK MCDONALD  
SEAN M. GREEN  
DOJ Tax Division Trial Attorneys  
Northern Criminal Enforcement  
Section  
150 M Street, NE  
Washington, DC 20005



**Companion Case information MUST be completed by AUS/**United States District Court  
Eastern District of Michigan**Criminal Case Cover**

Case:2:21-cr-20209


Judge: Parker, Linda V.

MJ: Patti, Anthony P.

Filed: 03-24-2021 At 04:37 PM

INDI USA V RYAN DANIEL RICHMOND (LG

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete

<b>Companion Case Information</b>	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: 

Case Title: USA v. Ryan Daniel RichmondCounty where offense occurred : Oakland County ✓Check One: ☒ Felony ✓ ☐ Misdemeanor ☐ Petty☒ Indictment/\_\_\_ Information --- no prior complaint.

\_\_\_ Indictment/\_\_\_ Information --- based upon prior complaint [Case number: \_\_\_\_\_]

\_\_\_ Indictment/\_\_\_ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_


- ☐ Original case was terminated; no additional charges or defendants.
- ☐ Corrects errors; no additional charges or defendants.
- ☐ Involves, for plea purposes, different charges or adds counts.
- ☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant nameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

March 24, 2021

Date

  
 Mark McDonald  
 Assistant United States Attorney  
 210 Federal Building  
 600 Church Street  
 Flint, Michigan 48502  
 Telephone: (810) 766-5177  
 Email: mark.s.mcdonald@usdoj.gov

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.